

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PATRICK R. TREANOR, LORRAINE	:	C.A. NO. 05-CV-11538-NMG
KELLEY TREANOR, INDIVIDUALLY, AND	:	
AS PARENT AND NEXT FRIEND OF	:	
MADELYN TREANOR, AND AS PARENT	:	
AND NEXT FRIEND OF ALLISON TREANOR:	:	
	:	
v.	:	
	:	
NATIONAL RAILROAD PASSENGER	:	
CORPORATION (a/k/a "AMTRAK") AND	:	
CSX TRANSPORTATION, INC.	:	

JOINT MOTION TO EXTEND SCHEDULING ORDER

NOW COME the parties jointly and request this Honorable Court to enter an Order extending the Scheduling Order by 60 days. As reasons therefor, the parties state as follows:

1. This is a personal injury lawsuit filed in July 2005 arising out of an incident that occurred on April 18, 2002 in Florida.
2. Defendants timely removed the case to this Court and filed an answer.
3. The parties have narrowed the issues in this case by stipulation filed with the Court on or about January 19, 2006. Among other things, the stipulation obviated the need for discovery as to liability as defendants conceded liability by stipulation.
4. Written discovery served on the plaintiffs remains outstanding, largely due to a serious automobile accident involving Mr. Treanor's parents. As a result of this incident, Mr. Treanor has spent a substantial amount of time in New York recently caring for his parents. As a result there has been a delay in plaintiffs' ability to respond to defendants' discovery requests.
5. The parties seek to extend the tracking order in this case to permit sufficient time to conduct the necessary depositions and other discovery in advance of engaging in mediation in an effort to reach a mutually agreeable resolution of this matter.

6. The parties are engaged in discussions and negotiations regarding alternative dispute resolution and settlement procedures, including mediation.

7. The parties respectfully request that the Scheduling Order be amended as follows:


Written discovery answered by	March 15, 2006
Amendments and supplements to pleadings	March 31, 2006
All fact depositions by	July 15, 2006
Referred to mediation	July 2006
All trial experts designated by	August 31, 2006
Expert depositions completed by	September 30, 2006
Dispositive motions filed by	November 15, 2006
Final pre-trial conference court)	January 15, 2007 (or as set by
Ready for trial as of	February 4, 2007

8. No party will suffer any prejudice by the allowance of this motion.

WHEREFORE, plaintiffs Patrick Treanor, Lorraine Kelly Treanor, Allison Treanor, and Madelyn Treanor, and defendants CSX Transportation, Inc. and National Railroad Passenger Corporation hereby jointly move this Court to extend the Scheduling Order as set forth herein.

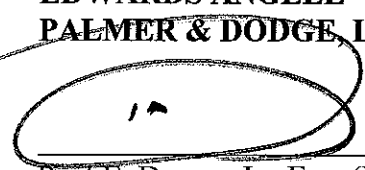
PATRICK R. TREANOR,
LORRAINE KELLEY TREANOR,
INDIVIDUALLY, AND AS PARENT AND
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AND AS PARENT AND NEXT
FRIEND OF ALLISON TREANOR

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NATIONAL RAILROAD PASSENGER
CORPORATION ("Amtrak") and CSX
TRANSPORTATION, INC.

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